

XAVIER GONZALES, ESQ.
Nevada Bar No.: 1862
528 S. Casino Center Blvd
Las Vegas, NV 89101
(702)388-8182
Attorney for Petitioner

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

QASIR AL MUKHTAR,)	
)	CASE NO: 2:14-cv-01441-RFB-CWH
Plaintiff,)	
)	PLAINTIFF'S UNOPPOSED
vs.)	MOTION FOR ENLARGEMENT
)	OF TIME TO FILE REPLY TO
THE UNITED STATES OF AMERICA, et al.,)	DEFENDANT'S MOTION TO
)	DISMISS PURSUANT TO
Defendants,)	FRCP 6(b)(1)(A)
)	

Comes now QASIR AL MUKHTAR, by and through his Attorney, XAVIER GONZALES, ESQ. hereby files a MOTION FOR ENLARGEMENT OF TIME to file it's Reply to the Motion to Dismiss / Lack of Jurisdiction, filed with the Court on September 8th 2015.

This motion is made and based upon Federal Rule of Civil Procedure FRCP 6, no. previous request for an extension has been requested.

Respectfully submitted this 18th day of September, 2015.

By: /s/ Xavier Gonzales, Esq.
XAVIER GONZALES, ESQ.
528 S. Casino Center Blvd, Ste 205
Las Vegas, NV 89101
Attorney for Petitioner

XAVIER GONZALES
ATTORNEY AT LAW
A PROFESSIONAL CORPORATION
528 S. Casino Center Blvd.
Ste 205
Las Vegas, Nevada 89101
(702) 388-8182 • Fax: (702) 388-8181 • E-Mail: xgonzales@xgonzales.com
Website: www.xgonzaleslaw.com

1 In support of the instant Motion, the Plaintiff submits the following:

- 2 1. The Motion to Dismiss/Lack of Jurisdiction was filed with the Court on
- 3 September 8th 2015.
- 4 2. On September 16th 2015, Counsel for Plaintiff contacted counsel for Defendant,
- 5 John J. W. Inkeles Esq., advising him that we had received the Motion to
- 6 Dismiss/Lack of Jurisdiction which was a comprehensive filing, and since the
- 7 issues in the matter are significantly complex and require a thorough review of
- 8 the facts and law, and that additional time is being requested for thorough review.
- 9 3. I advised of a minimum of 45 days to respond to the Defendant's Motion to
- 10 Dismiss the Petition.
- 11 4. John J. W. Inkeles Esq., stated on September 16th 2015 he had not objection to
- 12 Plaintiff's Motion for an Enlargement of Time of 45 days.

13 Therefore, it is hereby requested an additional 45 days from today's date to file a reply

14 as is requested. This Motion is made in good faith and not for the purposes of delay, and it is

15 believed neither party is prejudiced by the instant request for enlargement of time.

16 Respectfully submitted this 18th day of September, 2015.

17 By: /s/ Xavier Gonzales, Esq.

18 XAVIER GONZALES, ESQ.

19 528 S. Casino Center Blvd, Ste 205

20 Las Vegas, NV 89101

21 *Attorney for Petitioner*

22 IT IS SO ORDERED.

23 DATED this 18th day of September, 2015.

24 

25 RICHARD F. BOULWARE, II

26 UNITED STATES DISTRICT JUDGE